

DEPARTMENT OF CORRECTIONS

P.O. Box 942883

Sacramento, CA 94283-0001



94-102

January 6, 1995

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Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Secretary:

The enclosed comments are submitted by the California Department of Corrections in response to the proposed revision of the Commission's rules to ensure compatibility with enhanced 911 emergency calling systems (CC Docket No. 94-102). We have provided an original document and nine copies so that each commissioner may also receive a copy.

We appreciate this opportunity to submit comments for the Commission's consideration.

Sincerely,

G. KEVIN CARRUTH
Deputy Director
Planning and Construction Division

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Revision of the Commission's rules) CC Docket 94-102
to ensure compatibility with)
enhanced 911 emergency calling systems) RM-8143

Comments by the

STATE OF CALIFORNIA, DEPARTMENT OF CORRECTIONS

The Department of Corrections of the State of California, hereinafter "CDC", is a public safety agency with responsibility for the care, custody, treatment, training, discipline and employment of persons (inmates and parolees) confined and supervised under its jurisdiction. CDC has the responsibility for the administration of 29 State prisons with four more in design and construction. The Department currently has responsibility for a population of 126,000 inmates and 29,000 employees who staff these prisons.

CDC submits these comments in response to the Notice of Rulemaking wherein the FCC proposes to ensure the compatibility of private branch exchanges (PBXs) and other dispersed private telephone systems with enhanced 911 emergency services.

The California Department of Corrections finds that although the proposal sounds laudatory in relation to the general public, its implementation would be inconsistent with the operational needs of California prisons for the following reasons:

- Providing for the security and safety of staff and inmates are among the major objectives of prisons. Prisons are well equipped to handle the initial response to any emergency that might occur. Prison staff do not call 911 for emergency response. PBX telephone systems in prisons are designed to ensure the security of the institution as well as to provide an internal and external response to any fire or medical emergency or inmate disturbance that might occur. Prison telephone systems include several subsystems that are designed to ensure notification for immediate response to any emergency.
- The basic premise for the design of a prison telephone system is that calls into and out of a prison are controlled. Internal or external access is controlled through the use of a small percentage of Measured Business lines (MBs) and Direct Inward Dial (DIDs) lines. The preponderance of prison lines are restricted through assigning a Class of Service (COS) which determines whether an outside call can be received or made. One half to three-quarters of the lines cannot make or receive an outside call and therefore could not call 911.
- Requiring that all lines be available to Automated Number Identification (ANI) and to geographical location would not only be impractical but would be antithetical to ensuring the security of the prison.
- If an individual employee were to successfully reach a 911 operator and emergency vehicles arrived, they would not be allowed entrance to the prison.

For these reasons, the Department requests that prison telephone systems be exempted from the proposed rulemaking as described in this proposal.

PRISON TELEPHONE SYSTEMS

Prisons can be equated to a small city; they are self-contained. On the average, each prison has 100 buildings which are arranged campus style. All California prisons (currently 29) are served by PBXs. Local Exchange Carriers (LECs) provide service to each site, from 30 to 60 trunks. These trunks include "in only", "out only", DID, Measured Business lines and combination trunks. Our PBXs are configured for 400 to 1500 lines.

Most calls into a prison are directed through an Automated Attendant to certain security lines or to the Console Attendant. The Attendant will only connect certain calls to preapproved stations. The exception to this rule are certain Administrators who have MBs or DIDs.

Calls out of a prison, other than MBs or DIDs, can only be made from preapproved lines with selected COS through dialing "9". Most lines are restricted from calling out of the prison. The exception to this is the inmate pay telephone system which is a totally separate system. Inmate calls are collect only and are not routed through the PBX. Inmate lines are blocked from dialing 911. Inmate telephone systems should also be exempt from this proposal.

To report an emergency, prison staff may dial specific emergency numbers to Central Control, the Fire House or the Medical Area within the prison or they may use the Off-hook Alarm System (OHAS). All prison telephones are connected to the OHAS. If a telephone is taken off-hook for a pre-programmed amount of time

(usually 12 - 15 seconds) without dialing a complete number, or a telephone cord is cut or pulled from the wall, an alarm will be annunciated in Central Control. Officers can ascertain that an emergency really exists and/or can send officers to the location within minutes. These alarms are also annunciated in the prison Fire House and in the Medical Area, in which case an in-house fire engine or medical personnel can be dispatched. These alarms, and their initiating location, are automatically registered on a computer screen that is monitored 24 hours per day. If outside help is needed, all prisons have mutual aid agreements with local public safety agencies and hospitals. Fire, police or ambulance services can be obtained through these agreements. They do not dial 911 to reach these agencies.

RECOMMENDATION

The California Department of Corrections strongly recommends that prison telephone systems, both business and inmate, be exempted from all aspects of compatibility with enhanced 911 for emergency calling systems. It is neither necessary, useful nor practical for California prisons to use 911 or enhanced 911 for emergency response. Further, this system would require significant and unnecessary expenditure of State taxpayer funds.

If you have questions about our concerns or in relation to our opposition to this proposal, please call Jo Wallach, Acting Chief of the Office of Telecommunications at (916) 323-2306.

A handwritten signature in dark ink, appearing to read "G. K. Carruth". The signature is fluid and cursive, with a long horizontal stroke at the end.

G. KEVIN CARRUTH
Deputy Director
Planning and Construction Division